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Modern Slavery Act Transparency Statement, September 2019

On behalf of Aptum Technologies group of companies, this statement sets out the actions taken in the past year, ending August 31 2019, to ensure that Slavery and Human trafficking do not exist in our supply chains or any other part of our business, prepared specifically as required by s54. of the UK's Modern Slavery Act 2015.

Aptum Technologies acknowledges the important role that suppliers play in its corporate social responsibility efforts, especially with regards to the environmental and social impacts of their activities. Aptum was previously part of the Cogeco Inc, group of companies and for part of the year operated under their Corporate Social Responsibility Policy, which is aimed at ensuring all operations in the group were conducted in a productive and sustainable manner. Since May 2019, Aptum Technologies (previously known as Cogeco Peer 1) has been a standalone company, and in that time has been establishing its own Environmental, Social and Governance (ESG) standards, incorporating its corporate social responsibility program, including establishing its own Business Conduct & Ethics policy applicable to all persons whether employed, consultants or contractors that contribute to our business. A key tenet of this policy is respect of fundamental rights and freedoms of all individuals.

Accordingly, Aptum Technologies wishes to engage in business with suppliers that demonstrate strong commitment to sustainability and ethical behaviour. As with many technology companies with an extended 'upstream' supply chain, much of which is not easily identifiable to our people, we are dependent on our suppliers' own efforts to ensure ethical behaviors from its supply chain. Our main suppliers are networking and IT technology providers, IT equipment manufacturers/suppliers, professional and construction service providers.

Since 2015 Aptum (as Cogeco Peer 1) was progressively implementing its Supplier Code of Conduct. In establishing ourselves as a standalone company, we have developed our own Supplier Code of Conduct, and will be making this part of our vendor compliance requirements; taking steps to monitor the performance of our vendors with its requirements.

We have established an independent whistleblower line for any person to anonymously report non-compliance with our Supplier Code of Conduct without fear of repercussion or retaliation. The Board of Directors will be updated on our implementation of the Supplier Code of Conduct on an annual basis as part of our Corporate and Social Responsibility Reporting. The Code of Ethics, including the Supplier Code of Conduct, is approved by the Board of Directors.

Susan Bowen
CEO, Aptum Technologies